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Counsel to Barton Creek Senior Living Center, Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:
	:
Debtors.	:
-----X	

Chapter 11
Case No. 08-13555 (JMP)
(Jointly Administered)

**LIMITED RESPONSE OF BARTON CREEK SENIOR LIVING CENTER, INC. TO
DEBTORS' ONE HUNDRED SIXTIETH OMNIBUS OBJECTION TO CLAIMS
(SETTLED DERIVATIVES CLAIMS)**

Barton Creek Senior Living Center, Inc. ("Barton Creek") hereby files this Limited Response ("Limited Response") to the Debtors' One Hundred Sixtieth Omnibus Objection to Claims (Settled Derivative Claims) [Docket No. 18444] (the "Objection") and respectfully states as follows:

1. Lehman Brothers Holdings Inc. ("Lehman") and its affiliated debtors (collectively, the "Debtors") filed the Objection on July 12, 2011. Responses to the Objection are due August 10, 2011 and a hearing has been scheduled on same for August 25, 2011. The Debtors included in their Exhibit A to the Objection reference to two claims filed by Barton Creek: Claim Nos. 27227 (against Lehman) and 27228 (against Lehman Brothers Special Financing Inc.) (collectively, the "Barton Creek Claims"). Debtors' counsel contacted counsel for Barton Creek by e-mail, and stated therein that Debtors included the Barton Creek Claims in the Objection inadvertently, but declined to amend the Objection or file any other pleading with

the Court to confirm the Debtors' error. Instead, Debtors' counsel expressed its intention to file a listing of withdrawn objections along with any order entered with respect to the Objection.

2. Accordingly, Barton Creek files this Limited Response to preserve all of its rights to substantively respond to any objection as to the Barton Creek Claims the Debtors have raised should the withdrawal on entry of an order as to the Objection not be entered.

WHEREFORE, Barton Creek respectfully requests that the Court: (a) deny any objection to the Barton Creek Claims raised by the Objection should the Debtors, for any reason, neglect to withdraw their objections made thereto in the Objection; (b) preserve all rights of Barton Creek to substantively respond to the Objection; and (c) grant such other and further relief as it deems just and proper.

DATED: New York, New York
August 10, 2011

Respectfully submitted,

THOMPSON & KNIGHT LLP

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